

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA
AT OMAHA, NEBRASKA

GUILLERMO HERRERA, III,)	Case No.: 8:15-cv-426-JMG-CRZ
)	
Plaintiff,)	
)	
vs.)	DEFENDANT'S SUPPLEMENTAL
)	RESPONSES AND OBJECTIONS TO
)	PLAINTIFF'S FIRST REQUEST
UNION PACIFIC RAILROAD COMPANY, a)	FOR PRODUCTION OF
Delaware corporation,)	DOCUMENTS
)	
Defendant.)	

COMES NOW the Defendant, UNION PACIFIC RAILROAD COMPANY ("Union Pacific") and for its Supplemental Response and Objections to Plaintiff's First Request for Production of Documents, states and alleges as follows:

REQUEST NO. 1: Please provide all texts, emails, and voice mails by any employee of the Union Pacific Railroad, particularly supervisory personnel, relating in any fashion to the circumstances surrounding Mr. Herrera's injuries, his medical treatment, and decisions regarding his medical treatment.

RESPONSE: Objection. Defendant objects to this request as overly broad, unduly burdensome, vague, unlimited in time and, as written, seeks the disclosure of information which may be protected by the attorney-client and/or work product privileges. Subject to the foregoing, and without waiver of same, Defendant agrees to search for email communications and records of telephone calls involving company cell phones or computers assigned to Mike Rolow, Joe Linford and Carlos Diaz for the period July 26-29, 2015, as they are the three employees

involved in this incident with access to company-owned computers and cell phones; and if non-privileged, responsive information is identified it will be produced.

SUPPLEMENTAL RESPONSE: See attached record of calls for company cell phones utilized by Mike Rolow (801- -2970), Joe Linford (307- -2055) and Carlos Diaz (480- -5369), records of text messages between Rolow and Linford, records of text messages between Rolow and Diaz, and emails relating to Herrera incident being produced herewith.

REQUEST NO. 3: Please provide all records of telephone calls, emails or texts from the service provider for any phone of any supervisor involved in the investigation of Mr. Herrera's injuries, or decision making regarding his medical care.

RESPONSE: Objection. Defendant objects to this request as overly broad, unduly burdensome, vague and unlimited in time, and may seek the disclosure of information protected by the attorney/client or work product privileges. Further, these records are in the possession of the service provider and would be equally available to plaintiff as they are to defendant through a request for records from the service provider. Subject to the foregoing, and without waiver of same, to the extent the information requested in response to this Request is not already covered in response to Request No. 1, above, Defendant agrees to provide cell phone records for the cell phones used by Mike Rolow, Joe Linford and Carlos Diaz for the period July 26-29, 2015, as they are the three employees involved in this incident assigned to company-owned cell phones; and if non-privileged, responsive information is identified it will be produced.

SUPPLEMENTAL RESPONSE: See attached record of calls for company cell phones utilized by Mike Rolow (801- -2970), Joe Linford (307- -2055) and Carlos Diaz

(480- -5369), records of text messages between Rolow and Linford, records of text messages between Rolow and Diaz, and emails relating to Herrera incident being produced herewith.

REOUEST NO. 10.: Please provide all records of the measurements of the temperature of the rail around where Mr. Herrera was working on July 24, 25 and 26, 2015.

RESPONSE: See job briefings, temperature logs, production reports and reports of production delays for Gang 8501 being produced herewith.

SUPPLEMENTAL RESPONSE: See additional production reporting and engineering heat control records for July 25 and 26, 2015 being produced herewith.

REQUEST NO. 11.: Please provide all documentation of what items were provided to Mr. Herrera to guard against heat injuries, including, but not limited to:

- (a) water;
- (b) ice;
- (c) fruit;
- (d) Squenchers or Gatorade;
- (e) cooling station.

RESPONSE: Receipts for supplies purchased at the Onaga Country Market in Onaga, Kansas will be produced.

SUPPLEMENTAL RESPONSE: In addition to the receipts for supplies purchased at the Onaga Country Market in Onaga, Kansas previously produced, see attached list of materials ordered for Gang 8501 through Union Pacific's eProcurement for the month of July 2015.

REQUEST NO. 13: Please provide all medical records obtained by the Union Pacific Railroad relating to Mr. Herrera's heat injuries.

RESPONSE: All medical records obtained, to date, by plaintiff authorization are being sent to counsel for plaintiff under separate cover. See also the records produced with Defendant's Rule 26(a) Disclosures on or about January 29, 2016 and in a supplemental production dated April 15, 2016.

SUPPLEMENTAL RESPONSE: See additional records obtained, to date, by plaintiff authorization from Dr. Bennett Machanic, East Side Occupational Medical Center, Sierra Providence East Medical Center and Summit Urgent Care Clinic.

REQUEST NO. 16: Please provide all work orders for the work performed by the gang or gangs to which Mr. Herrera was assigned on July 24, July 25 and July 26, 2015.

RESPONSE: See production reports and reports of production delays being produced herewith.

SUPPLEMENTAL RESPONSE: See additional production reports for July 25 and 26, 2015 being produced herewith.

REQUEST NO. 19: Please provide the CV of John Grogan, Director of Industrial Hygiene, Union Pacific Railroad.

RESPONSE: The requested information will be produced.

SUPPLEMENTAL RESPONSE: See Grogan CV being produced herewith.

REQUEST NO. 26: Please provide a copy of Dennis Duffy's policy letter of November 22, 2005 addressed to "All Operating Department Management Employees; Subject: Employee Personal Injury Response," including the attached documents containing current FRA reporting

guidelines and Union Pacific Railroad's Policy Statement and Complaint Procedures for harassment and intimidation relating to reporting personal injuries and occupational illnesses, and any subsequent policy letter regarding this subject since November 22, 2005.

RESPONSE: See documents dated November 22, 2005 and February 29, 2009 produced herewith.

SUPPLEMENTAL RESPONSE: See document dated May 29, 2015 which is the current Personal Injury Response Policy for the Union Pacific Operating Department and was the policy in effect at the time of plaintiff's reported injury. Also produced herewith are additional prior versions dated February 28, 2011 and February 28, 2013.

REQUEST NO. 28: Please provide telephone billing records of Charlie Diaz, Bobbie Steely, Mike Rolow, Bobby Herrera, and any other employee or supervisor of Union Pacific Railroad documenting the time of all phone calls made or texts exchanged that relate in any fashion to Plaintiff's heat-related illness of July 26, 2015. Plaintiff is not requesting the complete itemized bill; only that portion of the phone record or phone bill that documents the time and duration of any call or text made between any employees or managers of the Union Pacific Railroad relating to Plaintiff's heat-related injury on July 26, 2015. Please indicate whether the calls or texts were made on a phone provided by the Union Pacific Railroad or the individual's private phone. Please identify the phone numbers on the bills or records, and the person to whom that phone number is assigned. By way of explanation, counsel for Plaintiff seeks the time of the call or text, the duration of the call, from whom the call or text was made, and to whom the call or text was made for every call or text made by any manager or employee of the Union Pacific Railroad relating to Plaintiff's injury on July 26, 2015.

RESPONSE: Objection. Defendant objects to this request as vague and indefinite, overly broad, unduly burdensome, unlimited in time, and seeks the disclosure of information not likely to lead to the discovery of admissible information. Defendant further objects to the extent the request seeks the disclosure of information protected by the attorney/client and/or work product privileges. Further, Defendant objects to the production of information from personal phones as it seeks the disclosure of information which is confidential, privileged, and would constitute an invasion of the privacy rights of employees who are not parties to this lawsuit. Subject to the foregoing, and without waiver of same, to the extent the information requested in response to this Request is not already covered in response to Request No. 1, above, Defendant agrees to provide cell phone billing records for the cell phones used by Mike Rolow, Joe Linford and Carlos Diaz for the period July 26-29, 2015, as they are the three employees involved in this incident assigned to company-owned cell phones; and if non-privileged, responsive information is identified it will be produced.

SUPPLEMENTAL RESPONSE: See attached record of calls for company cell phones utilized by Mike Rolow (801- -2970), Joe Linford (307- -2055) and Carlos Diaz (480- -5369), records of text messages between Rolow and Linford and records of text messages between Rolow and Diaz.

REQUEST NO. 29: Please provide any file of Plaintiff maintained by the Health Services Department or Medical Director of the Union Pacific Railroad.

RESPONSE: See documents produced with Defendant's Rule 26(a) Initial Disclosures on or about January 29, 2016 and supplemental records being produced herewith.

SUPPLEMENTAL RESPONSE: See additional documents being produced
herewith.

UNION PACIFIC RAILROAD COMPANY, A
Delaware corporation, Defendant,

BY: /s/ William M. Lamson, Jr.
William M. Lamson, Jr., #12374
LAMSON, DUGAN & MURRAY, LLP
10306 Regency Parkway Drive
Omaha, NE 68114
(402) 397-7300 = Telephone
(402) 397-7824 = Facsimile
wlamson@ldmlaw.com

ITS ATTORNEYS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Supplemental Response and Objections to Plaintiff's First Request for Production of Documents were served upon the following attorneys designated below via Federal Express this 6th day of June, 2016:

James L. Cox, Jr.
Brent Coon & Associates, PC
3801 E. Florida Ave., Suite 905
Denver, CO 80210-2500

/s/William M. Lamson, Jr.
William M. Lamson, Jr.

623054

Carlos Diaz Cell Phone

480- -5369

CALL_DT	CALL_DUR	LL_DIR_I	TO_NBR	EXTN	SMRY_DESC	VNDR_CODE	CALL_CITY	ORIG_CITY	MSG_FROM	MSG_TO	REC_SRC
7/26/2015 12:08 3:00		OUT			JOSEPH LINFORD	VERI	AFTON WY	HAVENSVILL KS			CELL_CALL
7/26/2015 12:08 3:00		IN				VERI	INCOMING CL	MANHATTAN KS			CELL_CALL
7/26/2015 12:22 6:00		IN				VERI	INCOMING CL	OROVILLE CA			CELL_CALL
7/26/2015 12:36 6:00		OUT				VERI	GILBERT AZ	TOPEKA KS			CELL_CALL
7/26/2015 12:36 6:00		IN				VERI	INCOMING CL	HAVENSVILL KS			CELL_CALL
7/26/2015 13:04 1:00		OUT				VERI	INDIO CA	HAVENSVILL KS			CELL_CALL
7/26/2015 13:05 6:00		OUT				VERI	INDIO CA	HAVENSVILL KS			CELL_CALL
7/26/2015 13:05 6:00		IN				VERI	INCOMING CL	TOPEKA KS			CELL_CALL
7/26/2015 14:21 1:00		OUT	480	2822	480 5369	VERI	PHOENIX AZ	HAVENSVILL KS			CELL_CALL
7/26/2015 14:22 6:00		OUT	530	8245	480 5369	VERI	MARYSVILLE CA	HAVENSVILL KS			CELL_CALL
7/26/2015 14:27 3:00		OUT	480	2822	480 5369	VERI	PHOENIX AZ	HAVENSVILL KS			CELL_CALL
7/26/2015 14:36 30:00		OUT	520	2521	480 5369	VERI	BOWIE AZ	EMMETT KS			CELL_CALL
7/26/2015 15:17 2:00		OUT	307	1293	480 5369	VERI	CHEYENNE WY	EMMETT KS			CELL_CALL
7/26/2015 15:18 3:00		OUT	402	9845	480 5369	VERI	OMAHA NE	EMMETT KS			CELL_CALL
7/26/2015 15:23 2:00		IN	307	2055	480 5369	JOSEPH LINFORD	VERI	INCOMING CL	EMMETT KS		CELL_CALL
7/26/2015 15:23 2:00		OUT	480	5369	307 2055	VERI	GILBERT AZ	EMMETT KS			CELL_CALL
7/26/2015 15:36 3:00		OUT	402	2582	480 5369	VERI	LONG PINE NE	EMMETT KS			CELL_CALL
7/26/2015 15:39 2:00		OUT	760	9863	480 5369	VERI	INDIO CA	EMMETT KS			CELL_CALL
7/26/2015 15:39 2:00		IN	480	5369	760 9863	VERI	INCOMING CL	TOPEKA KS			CELL_CALL
7/26/2015 16:04 5:00		OUT	480	5369	801 2970	ATT	PHOENIX, AZ	Salt Lake City 4G,UT			CELL_CALL
7/26/2015 16:11 1:00		IN	480	5369	307 2055	VERI	INCOMING CL	EMMETT KS			CELL_CALL
7/26/2015 16:11 2:00		OUT	307	2055	480 5369	JOSEPH LINFORD	VERI	AFTON WY	HAVENSVILL KS		CELL_CALL
7/26/2015 16:13 1:00		OUT	801	2970	480 5369	MICHAEL ROLOW II	VERI	SALT LAKE UT	HAVENSVILL KS		CELL_CALL
7/26/2015 16:14 4:00		IN	402	9845	480 5369		VERI	INCOMING CL	HAVENSVILL KS		CELL_CALL
7/26/2015 16:18 1:00		IN	402	9845	480 5369		VERI	INCOMING CL	HAVENSVILL KS		CELL_CALL
7/26/2015 16:23 2:00		OUT	801	2970	480 5369	MICHAEL ROLOW II	VERI	SALT LAKE UT	HAVENSVILL KS		CELL_CALL
7/26/2015 16:26 3:00		OUT	402	2582	480 5369		VERI	LONG PINE NE	HAVENSVILL KS		CELL_CALL
7/26/2015 16:35 1:00		OUT				ATT	PHOENIX, AZ	Salt Lake City 4G,UT			CELL_CALL
7/26/2015 16:36 3:00		IN				ATT	INCOMING, CL	Salt Lake City 4G,UT			CELL_CALL
7/26/2015 16:39 2:00		OUT				VERI	OMAHA NE	HAVENSVILL KS			CELL_CALL
7/26/2015 16:40 1:00		OUT				VERI	LONG PINE NE	HAVENSVILL KS			CELL_CALL
7/26/2015 16:44 1:00		OUT				VERI	LONG PINE NE	HAVENSVILL KS			CELL_CALL

Carlos Diaz Cell Phone

480- -5369

7/26/2015 16:47 4:00	OUT	RMCC	VERI	TOLL-FREE CL	HAVENSVILL KS	CELL_CALL
7/26/2015 17:01 1:00	OUT	MICHAEL ROLOW II	VERI	SALT LAKE UT	HAVENSVILL KS	CELL_CALL
7/26/2015 17:04 5:00	IN	MICHAEL ROLOW II	VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/26/2015 17:14 2:00	IN		VERI	INCOMING CL	OROVILLE CA	CELL_CALL
7/26/2015 17:18 2:00	OUT		VERI	OMAHA NE	HAVENSVILL KS	CELL_CALL
7/26/2015 17:21 2:00	OUT	JOSEPH LINFORD	VERI	AFTON WY	HAVENSVILL KS	CELL_CALL
7/26/2015 17:21 2:00	IN		VERI	INCOMING CL	EMMETT KS	CELL_CALL
7/26/2015 17:27 1:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/26/2015 17:28 2:00	IN	JOSEPH LINFORD	VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/26/2015 17:28 2:00	OUT		VERI	GILBERT AZ	EMMETT KS	CELL_CALL
7/26/2015 17:31 5:00	IN	AT&T LISTED NUMBER	VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/26/2015 17:36 3:00	OUT	MICHAEL ROLOW II	VERI	SALT LAKE UT	HAVENSVILL KS	CELL_CALL
7/26/2015 18:45 4:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/26/2015 19:13 2:00	OUT		VERI	MARYSVILLE CA	HAVENSVILL KS	CELL_CALL
7/26/2015 19:16 7:00	OUT		VERI	OMAHA NE	HAVENSVILL KS	CELL_CALL
7/26/2015 19:18 10:00	IN		ATT	INCOMING, CL	Salt Lake City 4G,UT	CELL_CALL
7/26/2015 20:04 1:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/26/2015 20:09 2:00	IN		ATT	INCOMING, CL	Salt Lake City 4G,UT	CELL_CALL
7/26/2015 20:18 10:00	OUT	MICHAEL ROLOW II	VERI	SALT LAKE UT	HAVENSVILL KS	CELL_CALL
7/26/2015 21:07 2:00	OUT		VERI	MANHATTAN KS	HAVENSVILL KS	CELL_CALL
7/26/2015 21:09 2:00	OUT	MICHAEL ROLOW II	VERI	SALT LAKE UT	HAVENSVILL KS	CELL_CALL
7/26/2015 21:11 10:00	OUT	JOSEPH LINFORD	VERI	AFTON WY	HAVENSVILL KS	CELL_CALL
7/26/2015 21:11 10:00	IN		VERI	INCOMING CL	MANHATTAN KS	CELL_CALL
7/26/2015 21:20 3:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/26/2015 21:24 1:00	OUT		VERI	MANHATTAN KS	HAVENSVILL KS	CELL_CALL
7/26/2015 21:54 41:00	OUT		VERI	PHOENIX AZ	HAVENSVILL KS	CELL_CALL
7/27/2015 6:57 2:00	OUT		VERI	GILBERT AZ	FLORENCE AZ	CELL_CALL
7/27/2015 7:01 2:00	IN		VERI	INCOMING CL	EMMETT KS	CELL_CALL
7/27/2015 7:01 2:00	OUT	TROY PASSEY	VERI	POCATELLO ID	HAVENSVILL KS	CELL_CALL
7/27/2015 7:13 2:00	OUT		ATT	PHOENIX, AZ	Salt Lake City 4G,UT	CELL_CALL
7/27/2015 7:31 2:00	OUT		VERI	INDIO CA	MAYETTA KS	CELL_CALL
7/27/2015 7:32 2:00	IN		VERI	INCOMING CL	TOPEKA KS	CELL_CALL
7/27/2015 8:13 1:00	IN	MICHAEL ROLOW II	VERI	INCOMING CL	TOPEKA KS	CELL_CALL
7/27/2015 8:57 2:00	IN	GEORGE NELSON	VERI	INCOMING CL	TOPEKA KS	CELL_CALL

Carlos Diaz Cell Phone

480- -5369

7/27/2015 9:00 34:00	OUT		VERI	OMAHA NE	TOPEKA KS	CELL_CALL
7/27/2015 9:55 16:00	IN		VERI	INCOMING CL	TOPEKA KS	CELL_CALL
7/27/2015 10:11 6:00	OUT		VERI	INDIO CA	TOPEKA KS	CELL_CALL
7/27/2015 10:11 6:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/27/2015 10:18 1:00	OUT		VERI	PHOENIX AZ	TOPEKA KS	CELL_CALL
7/27/2015 10:37 3:00	OUT		VERI	LONG PINE NE	TOPEKA KS	CELL_CALL
7/27/2015 10:50 1:00	OUT		VERI	LONG PINE NE	TOPEKA KS	CELL_CALL
7/27/2015 10:55 6:00	IN		VERI	INCOMING CL	TOPEKA KS	CELL_CALL
7/27/2015 11:38 3:00	IN		VERI	INCOMING CL	TOPEKA KS	CELL_CALL
7/27/2015 11:38 3:00	OUT		VERI	GILBERT AZ	EMMETT KS	CELL_CALL
7/27/2015 11:51 16:00	OUT		VERI	PHOENIX AZ	TOPEKA KS	CELL_CALL
7/27/2015 11:58 11:00	OUT		VERI	GILBERT AZ	FLORENCE AZ	CELL_CALL
7/27/2015 12:07 2:00	OUT		VERI	PHOENIX AZ	TOPEKA KS	CELL_CALL
7/27/2015 13:08 10:00	OUT		VERI	GILBERT AZ	NORTH PLAT NE	CELL_CALL
7/27/2015 13:09 10:00	IN	RICHARD BENNETT	VERI	INCOMING CL	SAINT MARY KS	CELL_CALL
7/27/2015 13:19 1:00	OUT	GEORGE NELSON	VERI	TUCSON AZ	EMMETT KS	CELL_CALL
7/27/2015 13:58 11:00	IN	GEORGE NELSON	VERI	INCOMING CL	EMMETT KS	CELL_CALL
7/27/2015 14:57 3:00	OUT		VERI	GILBERT AZ	HAVENSVILL KS	CELL_CALL
7/27/2015 14:58 3:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/27/2015 15:00 1:00	OUT		VERI	GILBERT AZ	HAVENSVILL KS	CELL_CALL
7/27/2015 15:00 2:00	OUT		VERI	GILBERT AZ	HAVENSVILL KS	CELL_CALL
7/27/2015 15:00 1:00	IN		VERI	INCOMING CL	TOPEKA KS	CELL_CALL
7/27/2015 15:02 7:00	IN		VERI	INCOMING CL	EMMETT KS	CELL_CALL
7/27/2015 15:02 7:00	OUT	JOSEPH LINFORD	VERI	AFTON WY	HAVENSVILL KS	CELL_CALL
7/27/2015 15:11 12:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/27/2015 15:11 1:00	OUT		VERI	GILBERT AZ	KANSAS CIT MO	CELL_CALL
7/27/2015 15:23 6:00	OUT		VERI	PHOENIX AZ	HAVENSVILL KS	CELL_CALL
7/27/2015 15:37 1:00	OUT		VERI	GILBERT AZ	FLORENCE AZ	CELL_CALL
7/27/2015 15:45 1:00	OUT		VERI	GILBERT AZ	MAYETTA KS	CELL_CALL
7/27/2015 15:45 1:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/27/2015 16:56 1:00	OUT	GEORGE NELSON	VERI	TUCSON AZ	HAVENSVILL KS	CELL_CALL
7/27/2015 16:58 11:00	OUT		VERI	GILBERT AZ	MANHATTAN KS	CELL_CALL
7/27/2015 16:59 11:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/27/2015 17:50 4:00	OUT		VERI	MARYSVILLE CA	HAVENSVILL KS	CELL_CALL

Carlos Diaz Cell Phone

480- -5369

7/27/2015 17:50 4:00	IN		VERI	INCOMING CL	MANHATTAN KS	CELL_CALL
7/27/2015 17:54 34:00	OUT		VERI	PHOENIX AZ	HAVENSVILL KS	CELL_CALL
7/27/2015 18:29 1:00	OUT		VERI	MARYSVILLE CA	MANHATTAN KS	CELL_CALL
7/27/2015 18:29 1:00	IN		VERI	INCOMING CL	MANHATTAN KS	CELL_CALL
7/27/2015 22:25 5:00	OUT		VERI	PHOENIX AZ	MANHATTAN KS	CELL_CALL
7/28/2015 5:15 3:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/28/2015 7:38 1:00	OUT		VERI	EL PASO TX	HAVENSVILL KS	CELL_CALL
7/28/2015 8:34 2:00	OUT		VERI	GILBERT AZ	WAMEGO KS	CELL_CALL
7/28/2015 8:40 3:00	IN		VERI	INCOMING CL	WAMEGO KS	CELL_CALL
7/28/2015 8:40 3:00	OUT		VERI	GILBERT AZ	TOPEKA KS	CELL_CALL
7/28/2015 9:15 1:00	OUT		VERI	LONG PINE NE	WAMEGO KS	CELL_CALL
7/28/2015 9:26 2:00	OUT		VERI	LONG PINE NE	WAMEGO KS	CELL_CALL
7/28/2015 11:02 2:00	IN		VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/28/2015 11:03 2:00	OUT	TROY PASSEY	VERI	POCATELLO ID	HAVENSVILL KS	CELL_CALL
7/28/2015 11:04 2:00	IN		VERI	INCOMING CL	EMMETT KS	CELL_CALL
7/28/2015 13:14 3:00	OUT		VERI	CHEYENNE WY	EMMETT KS	CELL_CALL
7/28/2015 17:05 3:00	IN	MICHAEL ROLOW II	VERI	INCOMING CL	HAVENSVILL KS	CELL_CALL
7/28/2015 17:05 3:00	OUT		ATT	PHOENIX, AZ	Hutchinson 4G,KS	CELL_CALL
7/28/2015 17:24 3:00	OUT		VERI	EL PASO TX	HAVENSVILL KS	CELL_CALL
7/28/2015 17:27 23:00	OUT		VERI	PHOENIX AZ	HAVENSVILL KS	CELL_CALL
7/28/2015 19:39 3:00	IN		VERI	INCOMING CL	MANHATTAN KS	CELL_CALL
7/28/2015 20:55 6:00	IN		VERI	INCOMING CL	MANHATTAN KS	CELL_CALL
7/29/2015 9:07 1:00	OUT		VERI	OMAHA NE	HAVENSVILL KS	CELL_CALL
7/29/2015 9:09 1:00	OUT		VERI	OMAHA NE	HAVENSVILL KS	CELL_CALL
7/29/2015 9:12 1:00	OUT		VERI	OMAHA NE	HAVENSVILL KS	CELL_CALL
7/29/2015 9:57 12:00	OUT		VERI	PHOENIX AZ	HAVENSVILL KS	CELL_CALL
7/29/2015 10:28 1:00	OUT		VERI	OMAHA NE	EMMETT KS	CELL_CALL
7/29/2015 13:04 2:00	OUT		VERI	GILBERT AZ	WAMEGO KS	CELL_CALL
7/29/2015 13:05 2:00	IN		VERI	INCOMING CL	EMMETT KS	CELL_CALL
7/29/2015 14:16 1:00	IN	TROY PASSEY	VERI	INCOMING CL	EMMETT KS	CELL_CALL
7/29/2015 14:16 1:00	OUT		VERI	GILBERT AZ	CENTRALIA KS	CELL_CALL
7/29/2015 16:08 9:00	OUT		VERI	RIVERSIDE CA	HAVENSVILL KS	CELL_CALL
7/29/2015 18:38 3:00	OUT		ATT	PHOENIX, AZ	Hutchinson 4G,KS	CELL_CALL
7/29/2015 18:39 3:00	IN	MICHAEL ROLOW II	VERI	INCOMING CL	MANHATTAN KS	CELL_CALL

Carlos Diaz Cell Phone

480- -5369

7/29/2015 18:45 1:00	OUT	MICHAEL ROLOW II	VERI	SALT LAKE UT	MANHATTAN KS	CELL_CALL
7/29/2015 18:45 1:00	IN		ATT	INCOMING, CL	Hutchinson 4G,KS	CELL_CALL
7/29/2015 20:36 1:00	OUT		VERI	KEARNEY NE	MANHATTAN KS	CELL_CALL
7/29/2015 21:17 12:00	OUT		VERI	PHOENIX AZ	MANHATTAN KS	CELL_CALL